

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

LAW OFFICES OF NONA L. OSTROVE, LLC

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By: Nona L. Ostrove, Esq. NO 2942

Attorneys for Washington's Crossing at Locust Grove Homeowners Association, Inc.

In re:	:	IN BANKRUPTCY
	:	CHAPTER 13
	:	
Amelia Brignola	:	CASE NO. 18-14654/JNP
	:	
Debtor	:	
	:	

**CERTIFICATION IN SUPPORT OF MOTION FOR RELIEF  
FROM STAY**

Cheryl Buriak, of full age, certifies as follows:

1. I am a property manager of First Service Residential, managing agent for the Washington's Crossing at Locust Grove Homeowners Association, Inc. and am authorized to make this certification on behalf of the management company and the condominium association. I have knowledge of the payment history and amount due from Amelia Brignola for assessment fees and other charges due and owing from Amelia Brignola to Washington's Crossing at Locust Grove Homeowners Association.

2. Amelia Brignola is the owner of the unit located at 142 Liberty Way, Deptford, NJ that is part of Washington's Crossing at Locust Grove Homeowners Association. As an owner of this unit, pursuant to the Declarations of Covenants and Restrictions, she has an obligation to pay monthly maintenance fees duly assessed by the homeowners association. The

monthly assessment fee is currently \$130.00 per month. Ms. Brignola is also obligated to pay a late fee of \$20.00 per month for any assessment that is more than 15 days late.

3. Amelia Brignola filed a petition under Chapter 13 of the Bankruptcy Code on March 9, 2018. The Plan was confirmed on August 2, 2018. Pursuant to the Bankruptcy Code, Amelia Brignola has an obligation to maintain post petition monthly assessment fees beginning with the assessments due April 1, 2018. The post petition account was current through June 30, 2018.

4. Since the petition date, 12 payments should have been made to Washington's Crossing at Locust Grove Homeowners Association. Debtor remitted only 3 payments leaving 9 payments in arrears plus unpaid late fees through the payment due March 1, 2019. The total amount of post-petition payments in default (monthly payment plus late fees) beginning is as follows:

<b><u>Date Payment Due</u></b>	<b><u>Amount Due</u></b>	<b><u>Date Paid</u></b>	<b><u>Amount Paid</u></b>
04/01/18	\$130.00	04/05/18	\$120.00
05/01/18	\$130.00	05/07/18	\$120.00
06/01/18	\$130.00	09/25/18	\$150.00
07/01/18	\$130.00		
08/01/18	\$130.00		
09/01/18	\$130.00		
10/01/18	\$130.00		
11/01/18	\$130.00		
12/01/18	\$130.00		
01/01/19	\$130.00		
02/01/19	\$130.00		

03/01/19                      \$130.00

Unpaid Late fees charged: \$240.00

**TOTAL CHARGE   \$1,800.00                      AMOUNT PAID      \$390.00**

**POST PETITION AMOUNT DUE THROUGH MARCH 15, 2019      \$1,410.00**

5.      The above does not include legal fees and costs incurred by Washington's Crossing at Locust Grove Homeowners Association in this matter.

6.      This certification is submitted in support of a motion seeking relief from stay for failure to make post-petition payments due.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing is willfully false, I am subject to punishment.

Dated: 03/15/2019

/s/ Cheryl Buriak  
Cheryl Buriak